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Counsel for Defendant
Jizhong Chen

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES,

Plaintiff,

vs.

JIZHONG CHEN,

Defendant.

Case No. CR 19-00056 EJD

STIPULATION AND ~~PROPOSED~~ ORDER
TO CONTINUE STATUS CONFERENCE

IT IS HEREBY STIPULATED AND AGREED between the Government, through Assistant United States Attorney Marissa Harris, and Defendant Jizhong Chen, through his attorney Daniel Olmos, that the status hearing in this matter be continued from June 6, 2022, to August 29, 2022, at 1:30 p.m.

The defense has lodged a sealed subpoena duces tecum pursuant to Federal Rule of Criminal Procedure 17(c). The defense met and conferred with counsel for third party Apple Inc., the recipient of the subpoena, and has agreed to a compliance date of June 6, 2022. Apple Inc. has also filed a motion to quash portions of the subpoena, and that motion has been referred to the Magistrate Court. Due to the expected third-party discovery and pending motion to quash, the defense needs

1 additional time to prepare. The parties here agree to continue the status conference to August 29,
2 2022.

3 The parties agree that the time between June 6, 2022, and August 29, 2022, should be
4 excluded from calculations under the Speedy Trial Act, which excludes delay when the interests of
5 justice in allowing for the effective preparation of the defense outweigh the best interest of the public
6 and the defendant in a speedy trial, taking into account the exercise of due diligence. 18 U.S.C. §§
7 3161(h)(7)(A) and (B)(iv).
8

9 For the foregoing reasons, the parties stipulate to continue the status conference to August
10 29, 2022.

11 IT IS SO STIPULATED.
12

13 Dated: June 2, 2022

NOLAN BARTON & OLMOS, LLP

14 /s/ Daniel B. Olmos

15 Daniel B. Olmos

16 Attorney for Defendant Jizhong Chen
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18
19 Dated: June 2, 2022

Stephanie Hinds, United States Attorney

20 /s/ Marissa Harris

21 By: Marissa Harris

22 Assistant United States Attorney
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3 UNITED STATES DISTRICT COURT
4 FOR THE NORTHERN DISTRICT OF CALIFORNIA
5 SAN JOSE DIVISION
6

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8 UNITED STATES,

9 Plaintiff,

10 v.

11 JIZHONG CHEN,


12 Defendant.
13
14

Case No. CR 19-00056 EJD

~~PROPOSED~~ ORDER TO CONTINUE
STATUS CONFERENCE

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16 GOOD CAUSE APPEARING, it is hereby ordered that the status conference currently
17 scheduled for June 6, 2022, be continued to August 29, 2022, at 1:30 p.m. Based upon the
18 representation of counsel and for good cause shown, the Court also finds that the time between June
19 6, 2022, through and including August 29, 2022, shall be excluded from calculations under the
20 Speedy Trial Act. The interests of justice in allowing for the effective preparation of the defense and
21 continuity of counsel outweigh the best interest of the public and the defendant in a speedy trial,
22 taking into account the exercise of due diligence. 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).
23

24 Dated: June 2, 2022

25 
26 The Hon. Edward J. Davila
27 United States District Judge
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